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LOS ANGELES

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13 MELANIE GORDON

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 MELANIE GORDON, an individual, on
17 her own behalf and on behalf of all others
18 similarly situated,

19 Plaintiff,

20 vs.

21 SENSEA PRODUCTS, LLC, a Delaware
22 Limited Liability Company; DR. ALAN
23 R. HIRSCH, an individual; INTELLIGENT
24 BEAUTY, INC., a Delaware Corporation,
25 and DOES 1 through 10, inclusive,

26 Defendants.

CV11 03457SVW (MANx)

CASE NO.

CLASS ACTION

COMPLAINT FOR:

1. Violations of the Unfair Competition Law, California Business and Professions Code Sections 17200 *et seq.*;
2. Violations of the False Advertising Law, California Business and Professions Code Section 17500;
3. Violations of the Consumers Legal Remedies Act, California Civil Code Sections 1750 *et seq.*;
4. Breach of Express Warranty

DEMAND FOR JURY TRIAL

1 Plaintiff MELANIE GORDON ("Plaintiff") brings this action against
2 Defendants SENSEA PRODUCTS, LLC, DR. ALAN R. HIRSCH, INTELLIGENT
3 BEAUTY INC., and Does 1 through 10 (collectively, "Defendants") on behalf of
4 herself and all others similarly situated, and makes the following allegations upon
5 information and belief, except as to her own actions, the investigation of her counsel,
6 and the facts that are a matter of public record:
7
8

9 INTRODUCTION

10 1. Defendants market a product entitled the Sensa Weight Loss System
11 ("Sensa"), which purports to provide the consumer an easy, get-thin-quick solution,
12 without diet or exercise. Sensa consists of crystals, or "tastants," which are
13 purportedly tasteless, and consist of maltodextrin, tricalcium phosphate, silica, and
14 natural and artificial flavors, which the consumer is instructed to sprinkle on his or her
15 food and simply watch the pounds melt away.
16
17

18 2. In order to convince consumers that such an incredulous product could
19 work, Defendants have saturated the market with claims that Sensa is "clinically
20 proven" and "guaranteed" to result in significant weight loss and is backed by twenty-
21 five years of scientific research and clinical studies.
22
23

24 3. In fact, none of the purported research or studies provides any sound
25 scientific support for Defendants' outlandish claims. To the contrary, there currently is
26 no scientific support that Sensa, in and of itself, could cause weight loss, as Defendants
27 have claimed.
28

PARTIES

1
2 4. Plaintiff is an individual who is a citizen and resident of Maine, who
3
4 purchased Sensa in November 2009 in reliance on Defendants' false and/or misleading
5 advertising.

6 5. Defendant SENSEA PRODUCTS LLC ("SPL") is a Delaware limited
7
8 liability company, registered with the California Secretary of State, with its
9 headquarters and principal place of business in Manhattan Beach, California.

10 6. Defendant DR. ALAN HIRSCH ("HIRSCH") is an individual who is a
11
12 citizen and resident of Illinois. HIRSCH is the purported creator of Sensa and the
13 purported author of scientific research and studies allegedly supporting the claims
14 made in the advertising of Sensa. HIRSCH appears prominently on SPL's website and
15 in several tv spots and interviews promoting Sensa nationwide, including California.

16 7. Defendant INTELLIGENT BEAUTY INC. ("IBI") is incorporated in the
17
18 State of Delaware and registered with the California Secretary of State, with its
19 headquarters and principal place of business in Manhattan Beach, California.

20 8. IBI and HIRSCH have an ownerships interest in SPL.

21 9. The true names and capacities, whether individual, corporate, associate or
22
23 otherwise, of each of the Defendants designated as a DOE are unknown to Plaintiff at
24 this time and therefore Plaintiffs sues defendants by such fictitious names. Plaintiff
25 will ask leave of the Court to amend this Complaint to show the true names and
26 capacities of the DOE defendants when that information has been ascertained.
27
28

1 Plaintiff is informed and believes and thereon alleges that each of the defendants
2 designated herein as a DOE is legally responsible in some manner and liable for the
3 events and happenings herein alleged and, in such manner, proximately caused harm
4 to Plaintiff as herein further alleged.
5

6 **JURISDICTION AND VENUE**
7

8 10. This Court has original jurisdiction pursuant to 28 U.S.C. §1332(d)(2). In
9 the aggregate, Plaintiff's claims and the claims of the other members of the Class
10 exceed \$5,000,000 exclusive of interest and costs, and there are numerous class
11 members who are citizens of states other than Defendants' states of citizenship.
12

13 11. This Court has personal jurisdiction over SPL and IBI because their
14 headquarters are located in California, within the Central District, and they conduct
15 substantial business in California.
16

17 12. This Court has personal jurisdiction over HIRSCH because he
18 purposefully directed his activities at California residents through his active
19 participation in the marketing of Sensa directed at California residents.
20

21 13. Venue is proper in this Court pursuant to 28 U.S.C. §1391 because many
22 of the acts and transactions giving rise to this action occurred in this District as SPL
23 and IBI have their principal place of business in this District and because Defendants
24 are subject to personal jurisdiction in this District.
25

26 ///
27

28 ///

FACTUAL ALLEGATIONS

1
2 14. Defendants manufacture, market, and sell Sensa, which consists of
3 crystals the consumer is instructed to sprinkle on his or her food and which Defendants
4 promise will cause weight loss without the consumer changing his or her eating or
5 exercise habits.
6

7
8 15. A two-month supply of Sensa costs approximately \$90, with each
9 additional month costing approximately \$60.

10 16. Through an extensive and comprehensive nationwide marketing
11 campaign, Defendants claim that this expensive weight loss aid is scientifically
12 proven to cause significant weight loss to anyone who sprinkles it on his or her food in
13 the course of their daily food, without any additional change to his or her eating habits
14 or exercise routine.
15
16

17 17. Defendants' advertising presents Sensa as tasteless "tastants" that, when
18 sprinkled on food, "work [] with your sense of smell to stimulate an area of your brain
19 called the 'satiety center,'" causing you to eat less than you would in the absence of the
20 "tastants."
21

22 Defendants' advertising and marketing repeatedly claim that Sensa is "Clinically
23 Proven," "Based on 25 years of research," "Proven Effective," "Tested in
24 Multiple Clinical Studies," and that "Studies show average weight loss 30 lbs. in
25 6 months." For example:
26
27

28 a. Sensa magazine advertisements appearing in *Shape* magazine

1 makes the often repeated claim that Sensa is "Clinically Proven" and that "[i]n one of
 2 the largest clinical studies ever conducted on a non-prescription weight-loss product,
 3 1,436 men and women lost an average of 30.5 pounds in 6 months without changing
 4 their existing diet or exercise program":
 5

ADVERTISEMENT

SPRINKLE ME SKINNY!



WHAT IS SENSEA?
 SENSEA® was designed to work with your sense of smell to help you feel full faster and eat less. There are no pills, stimulants, drugs or special foods to buy. And SENSEA® is calorie-free, sugar-free, sodium-free and gluten-free.



HOW TO USE
 Nothing compares to the ease of SENSEA®. All it takes is a couple of seconds to sprinkle SENSEA® on all of your food before enjoying your meal. Whether it's a home-cooked family dinner or a night out at your favorite restaurant, just bring along your SENSEA®. Sprinkle. Eat. Lose.



Group	Weight Loss (Pounds)
Sensa Group	30.5
Control Group	2.0

IT'S CLINICALLY PROVEN
 In one of the largest clinical studies ever conducted on a non-prescription weight-loss product, 1,436 men and women lost an average of 30.5 pounds in 6 months without changing their existing diet or exercise program.

Go to trysensa.com/shape for a special offer

SENSEA®

WEIGHT-LOSS SYSTEM

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(Shape Magazine, November 2010.)

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This advertisement is usually accompanied with full page advertisement claiming, *inter alia*, that Sensa is "Doctor Formulated / Clinically Proven," "Studies show average weight loss of 30 lbs in 6 months," and that "[i]n one of the largest clinical studies ever conducted ..., 1,436 people lost and average of 30.5 pounds in 6 months without changing their existing diet or exercise regime" (emphasis in the original):


Lose 30+ Pounds Without Dieting?

No Drugs • No Pills • No Stimulants

SPRINKLE
on your food



EAT
what you love



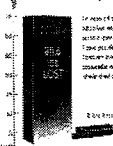
LOSE
without restrictions

WHAT IS SENSА?

Sensa is a clinically proven and doctor formulated weight loss supplement that helps you lose weight without restrictive dieting, exercise or pills.

WHY SENSА IS THE HIGHEST

- 1 TO POUND SPARKER**
Researcher: "It's a natural appetite suppressant, it's a natural weight loss trigger."
- 2 It's Not A Diet**
No prescription drugs, no restrictive dieting, no exercise requirements. It's a natural weight loss trigger."
- 3 Easy To Use**
Sensa is a powder. It's a powder that you can sprinkle on your food.



LOSE 46
pounds


SENSА
WITH LOSS SYSTEM

For a 30-Day Trial
tryensa.com/shape or (800) 838-6361


Lose 30+ Pounds without Dieting

No Drugs • No Pills • No Stimulants

SPRINKLE
on your food



EAT
what you love



LOSE
weight without restrictions

SOLANGE
LOST 46 lbs*
with SENSА

"I sprinkle SENSА on all my food and feel full faster. SENSА made losing weight so easy."

LOSE 46
pounds

SENSА
WITH LOSS SYSTEM

For a 30-Day Trial
tryensa.com/shape or (800) 838-6361

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b. Marketing appearing as Internet pop ups on such popular domains as www.hotmail.com, depict a large woman turning into a small woman, with claims that Sensa is "Clinically proven" to deliver an "[a]verage weight loss [of] 30 pounds in 6 months:"



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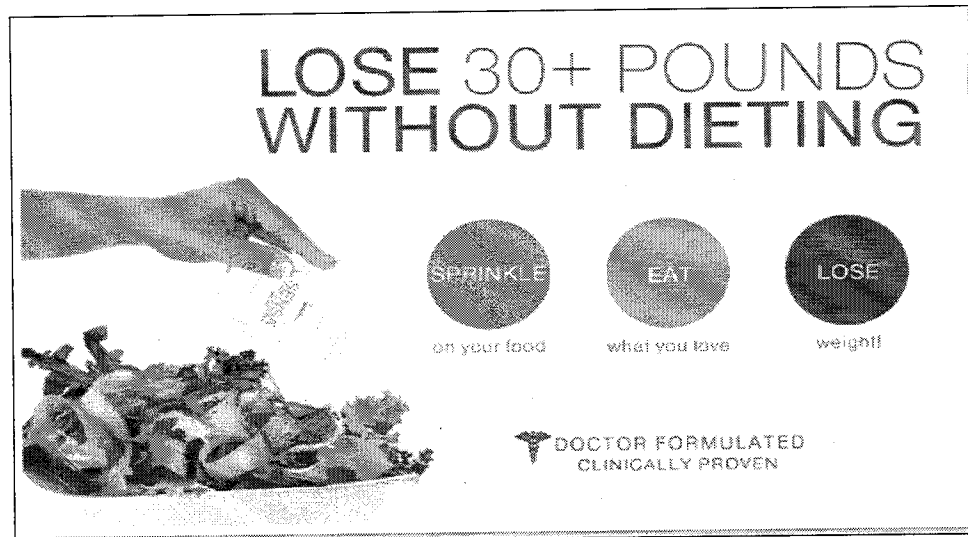
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c. Defendants' website www.trysensa.com, entitled "Natural Weight Loss System – Lose Weight With Sensa: Try Sensa.com," where consumers can learn about the product or purchase Sensa, makes similar claims that Sensa is scientifically proven to cause weight loss. The website's first page displays the following lead banner:



Next to this graphic appears a video of an individual identified as Dayna Devon who couches an advertisement as a news story and states:

"Hi, I'm Dayna Devon. I've been a reporter and broadcaster journalist for more than 20 years. So when my producers asked me to do a story on a weight loss product called Sensa, I thought, ... , this product sounds too good to be true. You may have read about Sensa in the New York Times and Time Magazine or seen it on Dateline NBC. Sensa's been getting lots of media attention because of a landmark 6-month clinical study in which 1,436 people lost an average of over 30 pounds each. ... And here's the really amazing part. They did it without any drugs or pills. Without changing their eating habits or adding any exercise routine. ... We guarantee it."

Dayna Devon's video contains background graphics that make the oft-repeated claim that Sensa is "Clinically Proven" and that "1,436 people lost an average of

1 30 lbs.” Dayna Devon has also appeared on Shop-NBC advertising, promoting and
2 selling Sensa. In fact, the study referred to by Dayna Devon is not a “landmark”
3 study, has never been published in a peer reviewed scientific journal, has not been
4 published or disseminated anywhere except as an abstract, and is not scientifically
5 sound or valid.
6

7
8 d. Defendants’ website www.trysensa.com also contains a prominent
9 banner with a link entitled “Clinically Proven.”



13 Under this link are three sub-categories entitled (i) “Clinically Proven,” (ii) “About Dr.
14 Hirsch,” and (iii) “SENSA® Advisory Panel.” The three web pages, alone and
15 combined as a whole, present the claim that Sensa is designed by medical
16 professionals, who use sound scientific principals, and that the Product’s claims are
17 supported by extensive research, study, and clinical trials. In fact, all of these claims
18 are false.
19
20

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(i) The "Clinically Proven" web page states:

**"NO OTHER WEIGHT-LOSS PRODUCT HAS SUCH
EXTRAORDINARY CLINICAL RESULTS."**

Over the course of 25 years, SENSEA[®] creator Dr. Alan Hirsch has conducted ongoing research on the effects of smell and taste on eating habits, ultimately leading him to spearhead one of the largest studies ever conducted on weight loss. Over a 6 month period, 1,436 women and men sprinkled scented, flavorless "Tastant" crystals on everything they ate. Participants were instructed not to change their existing diet or exercise program.

The 1,436 people in the treatment group who completed the program lost an average of 30.5 pounds - nearly 15% of their total body weight. Those in the control group lost only 2 pounds, on average.

This was followed by a double-blind, placebo-controlled study conducted by an independent laboratory, in which participants lost 27.5 pounds and about 14% of their body mass, on average. Participants were instructed not to change their existing diet or exercise program. Those in the control group gained half a pound, on average.

SENSEA[®] was proven effective in one of the largest clinical studies ever performed on a non-prescription weight-loss product." (emphasis in original)

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It appears as follows:

The screenshot shows the SENSEA Weight-Loss System website. The header includes the SENSEA logo, a 'HELP JAPAN' link, and navigation links for LOGIN, SHOPPING CART, and a Facebook link. A secondary navigation bar contains links for HOW IT WORKS, SUCCESS STORIES, CLINICALLY PROVEN, PRESS, mySENSEA.COM, and COMMUNITY. Below this, a banner reads 'CLINICALLY PROVEN | ABOUT DR. HIRSCH | SENSEA ADVISORY PANEL'.

The main headline states: **NO OTHER WEIGHT-LOSS PRODUCT HAS SUCH EXTRAORDINARY CLINICAL RESULTS.**

Text below the headline: Over the course of 25 years, SENSEA® creator Dr. Alan Hirsch has conducted ongoing research on the effects of smell and taste on eating habits, ultimately leading him to spearhead one of the largest studies ever conducted on weight loss. Over a 6 month period, 1,436 women and men sprinkled scented, flavorless "Tastant" crystals on everything they ate. Participants were instructed not to change their existing diet or exercise program.

Text: The 1,436 people in the treatment group who completed the program lost an average of 30.5 pounds - nearly 15% of their total body weight. Those in the control group lost only 2 pounds, on average.

Text: This was followed by a double-blind, placebo-controlled study conducted by an independent laboratory, in which participants lost 27.5 pounds and about 14% of their body mass, on average. Participants were instructed not to change their existing diet or exercise program. Those in the control group gained half a pound, on average.

SENSEA® was proven effective in one of the largest clinical studies ever performed on a non-prescription weight-loss product.

1,436-Person Clinical Study Results OVER A 6 MONTH PERIOD

Group	Weight Change (Pounds)
Sensea Group	30.5 LBS LOST
Control Group	2 lbs lost

Double-Blind, Placebo-Controlled Lab Study OVER A 6 MONTH PERIOD

Group	Weight Change (Pounds)
Sensea Group	27.5 LBS LOST
Placebo Group	0.5 lbs gained

Click here to view the 1,436-person clinical study
 Click here to view the Double-Blind 3rd-party study
 To learn more, go to www.SmellandTaste.org

Abstracts of the studies referred to by this page can be found by clicking the small links appears at the bottom of the page. The full studies have never been published in any peer reviewed scientific publication and are not publicly available.

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(ii) The "About Dr. Hirsch" web page states:

**"DR. ALAN HIRSCH, M.D.
CREATOR OF THE SENSEA WEIGHT LOSS SYSTEM**

Dr. Hirsch's 20-plus years of research regarding the impact of smell and taste on weight loss culminated in the patent-pending technology used in the SENSEA® Weight-Loss System.

- Board-certified neurologist
- Director of the Smell & Taste Treatment and Research Foundation in Chicago
- Nation's leading authority on the science of smell and taste
- Author of 6 books
- More than 200 published research studies
- Featured on Dateline NBC, CNN and Good Morning America."

The web page appears as follows:

SENSEA® WEIGHT-LOSS SYSTEM

CLINICALLY PROVEN | ABOUT DR. HIRSCH | SENSEA® ADVISORY PANEL

DR. ALAN HIRSCH, M.D.
CREATOR OF THE SENSEA WEIGHT-LOSS SYSTEM

Dr. Hirsch's 20-plus years of research regarding the impact of smell and taste on weight loss culminated in the patent-pending technology used in the SENSEA® Weight-Loss System.

- Board-certified neurologist
- Director of the Smell & Taste Treatment and Research Foundation in Chicago
- Nation's leading authority on the science of smell and taste
- Author of 6 books
- More than 200 published research studies
- Featured on Dateline NBC, CNN and Good Morning America

TIME FOX The New York Times The Washington Post EXTRA

"It's no surprise that Dr. Hirsch has discovered an innovative approach to weight loss that is supported by his extensive research and clinical studies on the powerful effect on smell and taste." - Rodney T. Miller, M.D.
University of Texas Southwestern Medical Center at Dallas

1 Next to the photo of HIRSCH is a video which purports to be from the television
2 program Dateline, produced by NBC, a marketing partner of Defendants through its
3 ShopNBC platform. The video is advertising in the guise of genuine news and
4 attempts to bolster the false claims that Sensa is supported by sound science, research
5 and studies. In addition, the “more than 200” so-called published studies by HIRSCH
6 are not publicly available. In fact, there are no published scientific studies of any kind
7 that support the claims made by Defendants.
8

9
10 18. In addition to print, internet, and television commercials, including
11 lengthy spots on home shopping networks, Defendants have also engaged in a
12 comprehensive marketing and publicity campaign in which HIRSCH provides
13 numerous interviews to different television programs bolstering his purported scientific
14 expertise along with the false claim that Sensa is supported by sound science and is
15 clinically proven.
16
17

18 19. To the contrary of Defendants’ claims, none of the purported studies or
19 research provide scientifically sound support for Defendants’ advertising claims. That
20

21 20. Indeed, the so-called studies have never been published in any peer
22 reviewed scientific publications and appear not be available to the public at all. As
23 described above, Sensa provides only abstracts or summaries of the so-called scientific
24 or clinical studies in two links, in small font, which appear at the bottom of the web
25 page entitled “Clinically Proven” at <http://www.trysensa.com/clinical-study.htm> (last
26 visited March 24, 2011). The contents of these abstracts, however, reveal that Sensa is
27
28

1 not supported by sound science.

2 21. Moreover, there is currently no available sound science to support
3
4 Defendants' assertion that consumption of Sensa with food, without further change to a
5 consumer's eating or exercise habits, will cause weight loss. To the contrary, all
6 available sound science indicates that Sensa is not likely to work as promised.

7
8 22. In fact, Defendants themselves impliedly admit that Sensa, by itself,
9 cannot cause weight loss, but only after they successfully deceive consumers into
10 purchasing Sensa. The "Usage Guide" delivered with the product after it is purchase,
11 instructs customers to (i) substitute a list of specific high calorie foods with alternative
12 and less caloric choices, (ii) drink plenty of water, and (iii) incorporate exercise (*see*
13 Exhibit B attached hereto, Sensa Weight Loss System – Usage Guide), methods that in
14 and of themselves lead to weight loss, without the use of Sensa. Yet even the Usage
15 Guide reiterates time and again the false claim that the efficacy of Sensa is supported
16 by sound science and clinical testing.
17
18
19

20 23. Defendants have reaped millions or dollars as a result of their false
21 advertising campaign. According to public statements by Defendants, their sales of
22 Sensa have exceeded \$5,000,000 in the four years preceding the filing of this
23 Complaint.
24

25 **CLASS ACTION ALLEGATIONS**

26 24. Plaintiff brings this action on her own behalf and on behalf of all other
27 persons similarly situated (the "Class"). The Class that Plaintiff seeks to represent
28

1 consists of all persons in the United States who purchased Sensa within four years
2 preceding the filing of this Complaint, until the final disposition of this action.

3
4 Excluded from the Class are Defendants; officers, directors, and employees of the
5 Defendants; any entity in which Defendants have a controlling interest; the affiliates,
6 legal representatives, attorneys, heirs, and assigns of the Defendants; any federal, state
7 or local government entity; and any judge, justice, or judicial officer presiding over
8 this matter and the members of their immediate families and judicial staffs.
9

10 25. The members of the Class are so numerous that joinder of all members
11 would be impracticable. Plaintiff reasonably estimates that there are many thousands
12 of purchasers of Sensa in the United States.
13

14 26. There is a well-defined community of interest among the members of the
15 Class because common questions of law and fact predominate, Plaintiff's claims are
16 typical of the members of the Class and Plaintiff can fairly and adequately represent
17 the interests of the Class.
18

19 27. This action satisfies the requirements of Federal Rule of Civil Procedure
20 23(b)(3) because it involves questions of law and fact common to the member of the
21 Class that predominate over any questions affecting only individual members,
22 including:
23

- 24 a. Whether Defendants' representations and conduct are likely to
25 deceive consumers;
26
27
28

- b. Whether Defendants violated California Unfair Competition Law, Business & Professions Code Section 17200, *et seq.* and Section 17500, *et seq.*;
- c. Whether, by their misconduct as set forth herein, Defendants have engaged in unfair or unlawful business practices;
- d. Whether, by their misconduct as set forth herein, Defendants have engaged in, deceptive, untrue, or misleading advertising;
- e. Whether, by their misconduct as set forth herein, Defendants have violated the California Consumer Legal Remedies Act, Civil Code Section 1750 *et seq.*;
- f. Whether, by their misconduct as set forth herein, Defendants have breached a warranty; and
- g. Whether Plaintiff and the Class are entitled to damages, restitution, civil penalties, and/or injunctive relief.

28. The claims of the Plaintiff class representative are typical of the claims of the members of the Class. Plaintiff has no interests antagonistic to those of the Class and Defendants have no defenses unique to Plaintiff.

29. Plaintiff will fairly and adequately protect the interest of the class and has retained attorneys experienced in class and complex litigation.

30. The prosecution of separate actions by individual members of the Class would create a risk of inconsistent or varying adjudications with respect to individual

1 members of the Class, which would establish incompatible standards of conduct for
2 Defendants and would lead to repetitive adjudication of common questions of law and
3 fact. Accordingly, class treatment is superior to any other method for adjudicating the
4 controversy. Plaintiff knows of no difficulty that will be encountered in the
5 management of this litigation that would preclude its maintenance as a class action
6 under Rule 23(b)(3).
7

8
9 31. Damages for any individual class member are likely insufficient to justify
10 the cost of litigation, so that in the absence of class treatment, Defendants' violations
11 of law inflicting substantial damages in the aggregate would go un-remedied without
12 certification of the Class.
13

14 32. Defendants have acted or refused to act on grounds that apply generally to
15 the class, as alleged above, and certification is also proper under Rule 23(b)(2).
16

17 **FIRST COUNT**

18 **(Violation of the California Unfair Competition Law,**

19 **Business & Professions Code §17200, *et seq.*)**

20
21 33. Plaintiff incorporates herein by reference each substantive former
22 paragraph of this complaint as if set forth fully here.
23

24 34. Plaintiff brings this cause of action on behalf of herself and on behalf of
25 the Class.
26

27 35. Plaintiff has suffered injury in fact and lost money or property as a result
28 of Defendants' conduct because she expended money to purchase Sensa in reliance on

1 Defendants' false and/or misleading advertising.

2 36. Defendants have engaged in unfair, unlawful, and fraudulent business
3 acts and practices as set forth above.
4

5 37. By engaging in the above-described acts and practices, Defendants have
6 committed one or more acts of unfair competition within the meaning of the Unfair
7 Competition Law, Business and Professions Code §17200 *et seq.*, which prohibits any
8 "unlawful," "fraudulent," or "unfair" business act or practice.
9

10 38. Defendants engaged in "unfair" business acts or practices by
11 disseminating a nationwide false and/or misleading marketing campaign as described
12 above. Defendants' false and/or misleading advertising harms consumers, and there is
13 no corresponding benefit to consumers that outweighs this harm.
14

15 39. Defendants engaged in "fraudulent" business acts or practices by
16 disseminating a nationwide false and/or misleading marketing campaign as described
17 above. Defendants' acts and practices have deceived, and/or are likely to deceive,
18 members of the consuming public.
19

20 40. Defendants engaged in "unlawful" acts and practices because their
21 actions as alleged herein violate, at a minimum, Civil Code §§ 1770(a)(2), 1770(a)(5),
22 1770(a)(7), 1770(a)(9), 1770(a)(17), and Business and Professions Code §17500 *et*
23 *seq.*, as well as Regulations of the Federal Trade Commission.
24

25 41. Plaintiff, on behalf of herself and on behalf of each member of the Class,
26 seeks restitution, injunctive relief, and all other relief allowed under the Unfair
27
28

1 Competition Law.

2 **SECOND COUNT**

3
4 **(Violation of the False Advertising Law,**

5 **California Business & Professions Code § 17500 *et seq.*)**

6 42. Plaintiff incorporates herein by reference each substantive former
7 paragraph of this complaint as if set forth fully here.
8

9 43. Plaintiff brings this cause of action on behalf of herself and on behalf of
10 the Class.
11

12 44. Defendants have advertised and marketed Sensa to the public and offered
13 it for sale on a nationwide basis, including in California.

14 45. Defendants have engaged in the advertising and marketing alleged herein
15 with intent to directly and indirectly induce the purchase of Sensa by consumers.
16

17 46. Defendants' advertisements and marketing representations are false
18 and/or misleading, and likely to deceive the public and / or have deceived the public by
19 falsely claiming that scientifically valid evidence proves Defendants' claims, or in
20 claiming that Sensa is likely to cause weight loss in and of itself, without any change in
21 the consumers' diet or exercise routine.
22

23 47. In making and disseminating the statements alleged herein, Defendants
24 knew or should have known that the statements were untrue or misleading, and acted
25 in violation of the Business and Professions Code § 17500, *et seq.*
26

27 48. Defendants' misrepresentations were material and Plaintiff relied on
28

1 Defendants' misrepresentations.

2 49. The misrepresentations by Defendants discussed above constitute false
3 and misleading advertising and therefore constitute a violation of California Business
4 & Professions Code §17500, *et seq.*

5
6 50. Plaintiff and the Class members based their decisions to purchase Sensa in
7 substantial part on Defendants' misrepresentations and false statements. Defendants
8 have reaped millions of dollars of revenues through the sale of Sensa as a result of the
9 false and misleading advertisements. Plaintiff and the Class were injured in fact and
10 lost money or property as a result of Defendants' wrongful conduct.

11
12 51. Plaintiff, on behalf of herself and the Class, seeks restitution, injunctive
13 relief and all other relief allowable under the False Advertising Law.

14
15
16 **THIRD COUNT**

17 **(Violation of Consumer Legal Remedies Act, California Civil Code § 1750 *et seq.*)**

18 52. Plaintiff incorporates herein by reference each substantive former
19 paragraph of this complaint as if set forth fully here.

20
21 53. Plaintiff brings this claim individually and on behalf of the Class.

22 54. This cause of action is brought pursuant to the Consumers Legal Remedies
23 Act, California Civil Code § 1750, *et seq.* (the "Act") because Defendants' actions
24 and conduct described herein constitute transactions that have resulted in the sale of
25 goods or services to consumers.

26
27 55. Plaintiff and each member of the Class are consumers as defined by
28

1 California Civil Code §1761(d).

2 56. Sensa constitutes “goods” within the meaning of Civil Code §1761(a).

3 57. Defendants have violated the CLRA in at least the following respects:

- 4
- 5 a. in violation of §1770(a)(2), Defendants misrepresented the
- 6 sponsorship, approval, and / or certification of Sensa;
- 7
- 8 b. in violation of §1 770(a)(5), Defendants represented that Sensa has
- 9 characteristics, uses, and benefits which it does not have;
- 10
- 11 c. in violation of §1770(a)(7), Defendants misrepresented that Sensa
- 12 is of a particular standard, quality or grade; and
- 13
- 14 d. in violation of §1770(a)(9), Defendants advertised Sensa with intent
- 15 not to sell it as advertised.

16 58. Defendants’ deceptive acts and omissions occurred in the course of selling

17 a consumer product and have occurred continuously through the filing of this

18 Complaint.

19

20 59. On April 22, 2011, Plaintiff notified Defendants in writing by certified

21 mail of the violations alleged herein and demanded that Defendants remedy those

22 violations. A copy of the letter Plaintiff sent to Defendants is attached as Exhibit A.

23

24 60. If Defendants do not remedy the violations alleged herein by May 23,

25 2011, Plaintiff will amend this complaint to add claims for actual, punitive, and

26 statutory damages as appropriate.

27

28

FOURTH COUNT

(Breach of Express Warranty)

61. Plaintiff incorporates herein by reference each substantive former paragraph of this complaint as if set forth fully here.

62. Plaintiff brings this claim individually and on behalf of the Class.

63. Plaintiff, and each member of the Class, formed a contract with Defendants at the time Plaintiff and the other members of the Class purchased Sensa. The terms of that contract include the promises and affirmations of fact made by Defendants in advertisements and the packaging of Sensa as described above. This product packaging and advertising constitutes express warranties, became part of the basis of the bargain, and is part of a standardized contract between Plaintiff and the members of the Class on the one hand, and Defendants on the other.

64. All conditions precedent to Defendants' liability under this contract have been performed by Plaintiff and the Class.

65. Defendants breached the terms of this contract, including the express warranties, with plaintiff and the Class by not providing a product that was scientifically proven to provide the promised weight-loss benefits.

66. As a result of Defendants' breach of warranty, Plaintiff and the Class have been damaged in the amount according to proof.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, on behalf of herself and all others similarly situated, prays for judgment against Defendants as follows:

- A. An order certifying this case as a class action and appointing Plaintiff and her counsel to represent the Class;
- C. An order requiring Defendants immediately to cease the wrongful conduct and false advertising described above;
- D. An order requiring Defendants to disseminate corrective advertising;
- E. For restitution, actual and punitive damages;
- D. For reasonable attorneys' fees and the costs of this action;
- E. For statutory pre-judgment interest; and
- F. For such other relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial of her claims to the extent authorized by law.

Dated: April 22, 2011

AHDOOT & WOLFSON, APC

By: 

Tina Wolfson
Attorneys for Plaintiff
MELANIE GORDON

Exhibit A

AHDOOT & WOLFSON, APC

ATTORNEYS

April 22, 2011

VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED

President, CEO, Manager or
Member
Sensa Product, LLC
2301 Rosecrans Avenue
Suite 4100
El Segundo, CA 90245

Dr. Alan R. Hirsch
845 North Michigan Avenue
Suite 990W
Chicago, IL 60611

President / CEO
Intelligent Beauty, Inc.
2301 Rosecrans Avenue
Suite 4100
El Segundo, CA 90245

**RE: Melanie Gordon vs. Sensa Products, LLC, Dr. Alan R. Hirsch & Intelligent
Beauty, Inc.**

**California Consumer Legal Remedies Act Demand
Civil Code Section 1782**

Dear Sir or Madam and Doctor:

Please be advised that this firm represents Plaintiff Melanie Gordon ("Plaintiff") on behalf of herself, all others similarly situated, in an action against Sensa Products, LLC, Dr. Alan R. Hirsch, and Intelligent Beauty, Inc. (collectively, "Defendants"). This notice is being sent to you pursuant to California Civil Code Section 1782(a)(2).

Our client is maintaining a class action on behalf of all consumers nationwide who purchased the "Sensa Weight Loss System" ("Sensa"). Plaintiff is alleging through this action that Sensa has been and continues to be marketed with the following messages, without limitation:

- (1) Sensa, in and of itself, causes significant weight loss, without any change in diet or exercise;
- (2) The above claims are clinically proven and supported by scientific evidence and studies.

Sensa Products, LLC
Dr. Alan R. Hirsch
Intelligent Beauty, Inc.
California Civil Code §1782 Demand
April 22, 2011
Page 2

It is alleged that these representations were and are false, and that Defendants knew or should have known at the time it made these representations that they were false.

The full allegations are contained in Plaintiff's Class Action Complaint, a copy of which is enclosed.

Despite the facts above, Defendants continue to make false and misleading representations in their advertising of Sensa.

These practices constitute violations of California Civil Code Section 1770 in at least the following respects:

- (a) in violation of Section 1770(a)(5), Defendants represented that Sensa has characteristics and benefits that it does not have;
- (b) in violation of Section 1770(a)(7), Defendants represented that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, when they are of another;
- (c) in violation of Section 1770(a)(9), Defendants have advertised Sensa with the intent not to sell it as advertised; and
- (d) in violation of Section 1770(a)(16), Defendants have represented that Sensa was supplied in accordance with previous representations, when in fact it was not.

In light of the foregoing, and pursuant to Civil Code Section 1782(a)(2), it is hereby demanded on behalf the Plaintiff, and all others similarly situated nationwide, that Defendants immediately correct, repair, replace, and otherwise rectify the violations of Civil Code Section 1770, through the following actions: that Defendants cease and desist in making representations regarding Sensa that are not in fact true, that they engage in a corrective advertising campaign which will alert the public to its misconceptions about Sensa, and that they refund the purchase price paid for Sensa, plus interest, costs and fees, to all purchasers of Sensa.

Plaintiff will amend her Complaint to include claims for injunctive relief, actual damages, punitive damages, and all other damages permitted under the California Consumer Legal Remedies Act unless appropriate correction, repair, replacement, or other remedy is given, or agreed to be given within thirty days after receipt of this notice pursuant to Civil Code Section 1782(b). Furthermore, please be advised that the portion of the class who are "senior citizens," or "disabled persons," and who suffered the aforementioned illegal acts and practices by Defendants will be entitled to treble damages and / or \$5,000 per person pursuant to Civil Code Sections 1780(b) and 3345. Therefore, in order to avoid further litigation, it is in the best interest of all concerned that Defendants rectify the situation immediately.

Sensa Products, LLC
Dr. Alan R. Hirsch
Intelligent Beauty, Inc.
California Civil Code §1782 Demand
April 22, 2011
Page 3

Note that in order for Defendants to avoid an action for damages they must do all of the following pursuant to Civil Code Section 1782(c):

1. Identify, or make a reasonable effort to identify, all present and former purchasers of Sensa;
2. Notify all such consumers that, upon their request, Defendants will refund the purchase price of Sensa plus reimbursement for interest, costs, and fees; and
3. Cease to engage in the methods, acts or practices outlined above.

We look forward to hearing from you.

Sincerely,
AHDROOT & WOLFSON, APC

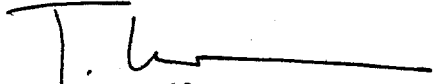

By: Tina Wolfson

Exhibit B



SPRINKLE AWAY THE POUNDS

[ABOUT SENSA® CREATOR, DR. ALAN HIRSCH, M.D.]



Dr. Alan Hirsch, creator of the SENSEA Weight-Loss System, is renowned for his 25 years of research on the science of smell and taste. He has written seven books on the subject, conducted and published more than 200 research studies, and holds multiple patents relating to the use of olfactory mechanisms to influence biological responses. His research has been cited in major publications, including *Time*, *Good Housekeeping* and *USA Today*, and he is a frequent guest on television programs such as *Dateline NBC*, *CNN*, the *CBS Early Show*, *Good Morning America* and *Extra*.

During the course of his clinical work as Neurological Director of the Smell & Taste Treatment and Research Foundation in Chicago, Dr. Hirsch discovered a critical link between olfactory senses and weight loss.

He observed that many of his patients experienced significant weight gain after losing their sense of smell. Understanding that the urge to eat is not governed by the stomach, but by the satiety center of the brain, Dr. Hirsch theorized that weight loss could also be achieved through the sense of smell. He developed scented, flavorless crystals, called Tastants, that can be sprinkled onto food in order to encourage weight loss.

Dr. Hirsch and his team tested more than 4,000 different Tastant combinations to identify the ones that triggered the most weight loss. Now, these patent-pending Tastants are available to you in the SENSEA Weight-Loss System.

As with any weight-loss product, this formula is designed and intended for use with a sensible program of diet and exercise. Please consult your physician prior to beginning any exercise regimen.



TrySensa.com

Sprinkle Away the Pounds!

●●●●● CONTENTS

1- KEYS TO SUCCESS WITH SENSEA

2 - WHAT IS SENSEA?

4 - WHO IS SENSEA FOR?

5 - WHY IS SENSEA DIFFERENT?

6 - HOW DOES SENSEA WORK?

8 - HOW TO USE SENSEA

11 - WHAT TO EXPECT

12 - THE COMPLETE SENSEA SYSTEM

13 - TRACKING SHEET

14 - REMEMBERING TO USE SENSEA

17 - SENSIBLE STRATEGIES TO STAY ON TRACK

19 - KICKSTARTING A HEALTHY LIFESTYLE

22 - STAYING MOTIVATED

23 - JOIN THE SENSEA COMMUNITY

24 - FREQUENTLY ASKED QUESTIONS

KEYS TO SUCCESS WITH SENSEA®

Ready to shed those pounds? Here are 4 important things you should do to achieve successful weight loss!

Sprinkle SENSEA on Everything You Eat

Those who sprinkle liberally tend to see the best results.

Use SENSEA Consistently Every Day

Get in the habit! It is important to remember to use SENSEA every day. If you forget, simply sprinkle it on your next meal. Soon it will become second nature!

Give SENSEA Time to Work

Don't get discouraged if you don't see results right away. Everyone loses weight at different rates. Stick with the system and you will see results.

Get Support

Turn to the SENSEA Community for support, expert advice and everything else you need to succeed. Log on to TrySensa.com and click on SENSEA Community.

SENSEA CUSTOMER CARE:

TrySensa.com

Toll-Free U.S. & Canada: (866) 514-2554

International: (310) 683-0952

Monday-Friday, 7 a.m. – 4 p.m. PST

[WHAT IS SENSEA®?]

SENSEA is an entirely new weight-loss system. Simply sprinkle it on all of your favorite foods to safely and effectively curb your appetite and lose weight without feeling deprived.

No stimulants • No sodium • No sugar
No calories • No gluten • No MSG



"If you don't want to be
on a restricted diet, it's
the perfect weight-loss
system for you."
— Amanda

Amanda
lost **50**
pounds



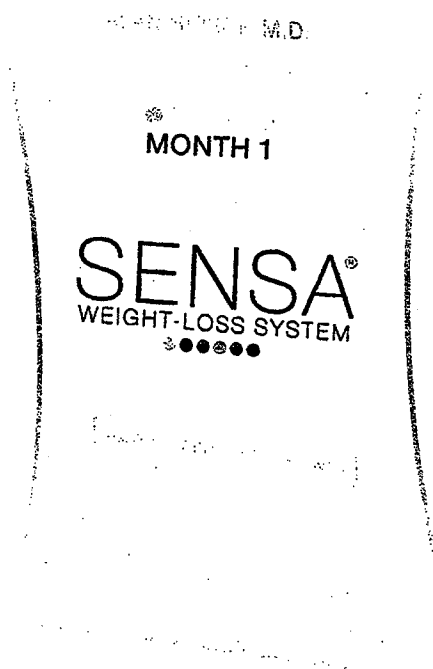
Before

Studies show average weight loss of 30 lbs in 6 months

WHO IS SENSEA® FOR?

SENSEA is essentially for anyone who wants to lose weight – whether it's to shed a few stubborn pounds or to see a drastic weight drop. SENSEA would also benefit:

- Anyone who wants to lose weight or maintain their current weight
- Anyone who has tried other weight-loss systems and failed
- Anyone who wants freedom from restrictive dieting
- Anyone who wants to lose weight without stimulants
- Anyone who wishes to accelerate their weight loss while on other weight-loss programs



[WHY IS SENSEA® DIFFERENT?]

SENSEA is different from all other weight-loss programs because it allows you to lose weight without food restrictions, stimulants or pills.

● It's Proven Effective

- Based on 25 years of research
- Tested in multiple clinical studies
- 30 pounds average weight loss

● It's Not A Diet

- No pills, stimulants or drugs
- No pre-packaged meals
- Calorie-free, sugar-free and sodium-free

● Easy to Use

- Sprinkle onto meals
- Fits in purse or pocket
- No drastic change in lifestyle

[WHY USE SENSEA INSTEAD OF DIETING]

Following a strict food regimen based on self-deprivation often leads to "diet burnout", eventually causing you to give up. "Diet burnout" is sometimes followed by the dreaded "yo-yo" effect. The end result: more frustration.

If you have tried pre-packaged foods, you have probably discovered they are not a practical means of long-term weight loss. They are expensive, do not allow for eating out and can have added sugar and/or salt.

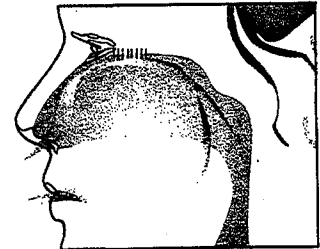
[HOW DOES SENSEA® WORK?]

As you eat, smell and taste receptors send messages to your brain, which releases hormones that tell your body it's time to stop eating. This is a phenomenon we call sensory specific satiety. Based on his research, and the remarkable weight-loss results seen in his studies, Dr. Hirsch found that SENSEA Tastants help to speed up the satiety process, thereby helping you to eat less and take in fewer calories, so you can lose weight without giving up your favorite foods.

[THE SATIETY PROCESS:]

HOW YOUR BODY KNOWS WHEN TO STOP EATING

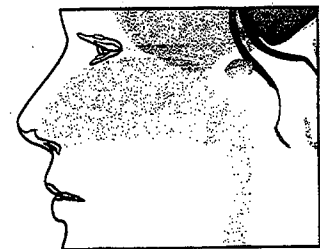
- Scents from foods cause nerve receptors in the nose to send signals to the olfactory bulb.



- When the olfactory bulb is stimulated, it triggers the satiety center in the hypothalamus.



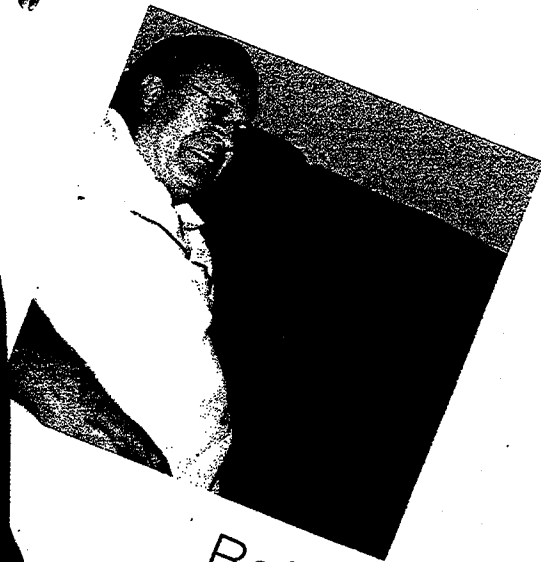
- This triggers the release of hormones that suppress hunger and appetite.



George
lost 25
pounds



"SENSA® gave me the
sense of being fulfilled.
I didn't have to reach
for snacks. Feeling full
helped me stay away
from food."
— George



Before

[HOW TO USE SENSEA®]

Sprinkle SENSEA evenly over the surface of your food. Use the Tastants labeled "Salty" on salty foods and "Sweet" on sweet foods. After 30 days, move on to the next month in the system. Use it on everything you eat, including healthy foods. Here's an idea of how much you should sprinkle:

Not Enough:

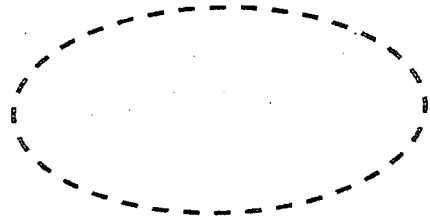
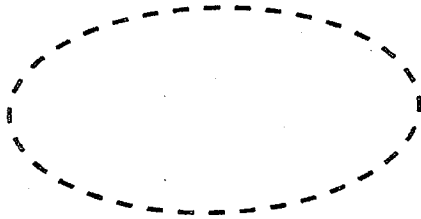


Just Right:



Too Much:

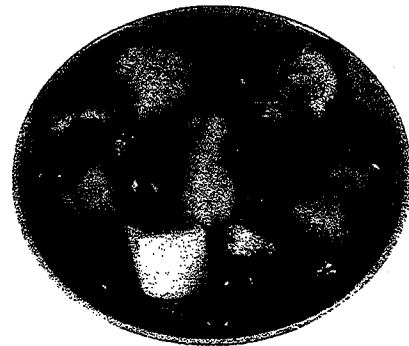


SENSA® INCLUDES TWO SIDES: SALTY & SWEET

Use the Tastants labeled "Salty" on foods like meat, fish, pasta and sandwiches. Here is an example of a "Salty" food:



Use the Tastants labeled "Sweet" on fruit and all sugar based foods like dessert. Here is an example of a "Sweet" food:

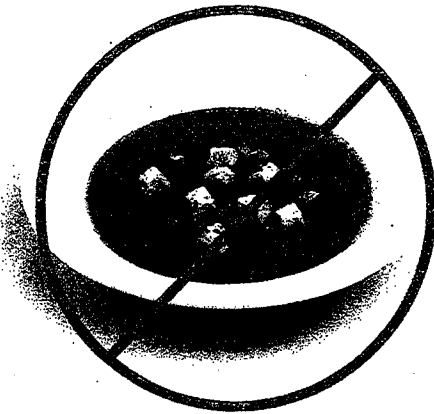


The "Salty" and "Sweet" Tastants do not contain salt or sugar and do not make your food taste salty or sweet. The words "Salty" and "Sweet" are simply used to describe on which type of food the Tastants should be sprinkled.

"Salty" Foods		"Sweet" Foods	
Eggs	Veggies	Pancakes	Jello
Sausage/Bacon	Pasta	Cereal with Milk	Pies
Sandwich	Chips/Pretzels	Fruit Salad	Pastries/Donuts
Garden Salad	Cheese	Cookies	Fruit
Tuna Salad		Brownies	

For borderline foods like oatmeal, corn, yogurt and cottage cheese, you may use either the "Salty" or "Sweet" Tastants.

Do not use SENSEA® in liquids.



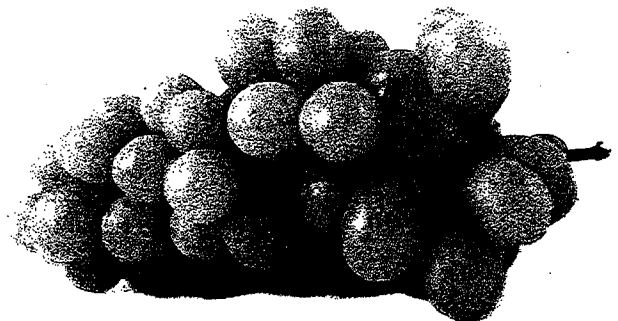
For additional food choices, go to TrySensa.com.

DIFFICULT TO SPRINKLE FOODS

You may come across some foods that are a little tricky when it comes to sprinkling Tastants. For foods like chips, nuts or pretzels, you can sprinkle SENSEA directly into the bag, or simply sprinkle over the food on a plate.

Some users have found that using a light spritz of water onto fruits like grapes and berries help the Tastants stick.

For more tips and tricks from other users, check out the Community Forums by logging in to TrySensa.com and clicking on SENSEA Community.



[WHAT TO EXPECT]

When you first start using SENSEA®, you may or may not feel different.

Below are some of the experiences people have reported when using SENSEA:

- Feel full faster during meals
- Reduced snacking
- Reduced cravings
- Reduced needs/desires for sweets
- Feel more satisfied with food
- Feel they are eating less over the course of the day
- Eating entire meals, but not going back for seconds
- Eating smaller portions

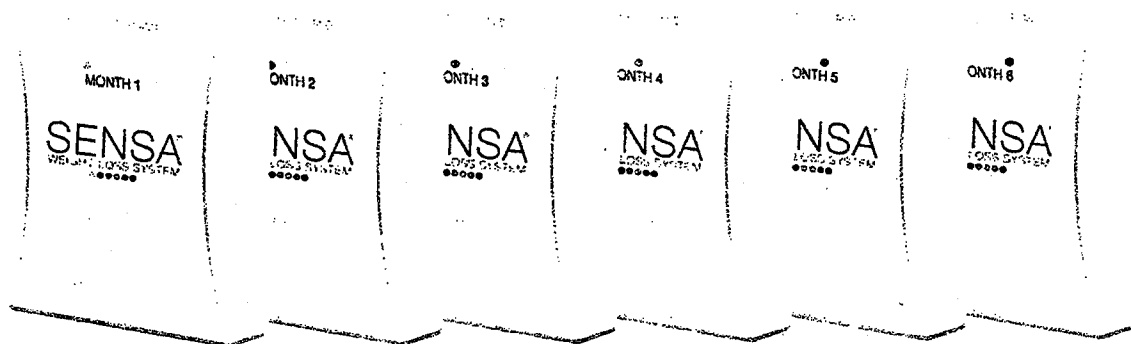
Some users did not feel different at all, but they experienced weight loss as the program progressed. The key is to continue with the system!

"I didn't notice a difference at first. I was just eating and snacking less during the day. I felt more satisfied."

- Carol

[THE COMPLETE SENSEA® SYSTEM]

SENSEA is a monthly weight-loss system. Each month is indicated by the number on the container and contains a different proprietary blend of Tastants. You are given two shakers for each month: one to keep at home and one to carry with you. Use the Tastants in chronological order of month. In order to achieve the best results, it is important to move on to the next month's Tastants after 30 days. This is because your olfactory senses can become accustomed to a particular Tastant combination. You should always move on to the next month, even if you have some Tastants left over. If you run out of SENSEA in less than a month, simply move on to the next month in the system and try using a little less. If you have a lot of SENSEA left over at the end of the month, try using a little more SENSEA the next month.



Should you wish to lose more weight or to maintain your weight beyond Month 6, simply start the system over again with Month 1.

TRACKING SHEET

Use this tracking sheet as a reminder to switch to your new shakers each month.


MONTH **1**

Date Opened: _____
Your Weight: _____
Discard Date: _____


MONTH **2**

Date Opened: _____
Your Weight: _____
Discard Date: _____


MONTH **3**

Date Opened: _____
Your Weight: _____
Discard Date: _____


MONTH **4**

Date Opened: _____
Your Weight: _____
Discard Date: _____


MONTH **5**

Date Opened: _____
Your Weight: _____
Discard Date: _____


MONTH **6**

Date Opened: _____
Your Weight: _____
Discard Date: _____

[REMEMBERING TO USE SENSA®]

The key to success with SENSA is to sprinkle it liberally and consistently on everything you eat. When you first start out, you may forget and need to create little reminders, but soon enough it will become second nature. Here are a few tips on remembering to use SENSA in various settings:

At a Restaurant

A sure way to remember to bring a shaker with you when dining out is to keep it in your purse or car glove compartment. Or, place one shaker next to your keys, purse or wallet so that you don't forget to take it with you.

At Work

Since each month comes with 2 shakers, it's helpful to keep one of the shakers at work. That way, you will always have it with you at your desk.

At a Party

It's easy to forget to use SENSA when you're too busy socializing. Try this: Place your extra shaker wherever your cell phone is stored. That way, each time you check for missed calls or text messages, you will be reminded to use SENSA.

TIPS FROM THE SENSE® COMMUNITY FORUMS ON REMEMBERING TO USE SENSE:

<p>D</p> <p>Joined: 06/01/08 Posts: 20</p>	<p>Remember to use your Sensa Posted Friday, June 10, 2008 at 10:03</p> <p>I took care of remembering to use Sensa with post-it notes. I put them all around my kitchen, in the silverware drawer, etc. Once I did that, I had no more problems remembering, and shortly thereafter I was able to get rid of the notes.</p> <p>Quote Send PM Link Top Bottom</p>
<p>Gaylene</p> <p>Joined: 06/03/08 Posts: 32</p>	<p>Remember to use your Sensa Posted Friday, June 11, 2008 at 5:00</p> <p>If you're in a lot of places, just put a sticker on the back of your hand or a string on your finger. That way, no matter where you are, you have the reminder with you.</p> <p>Quote Send PM Link Top Bottom</p>

For more tips from SENSE users,
check out the Community Forums by logging in to
TrySensa.com
and clicking on SENSE Community.

"I had a little trouble remembering to
sprinkle when I first started SENSE...but now
it's second nature. It gets easier every day!"
— Blake

"It was effortless,
and there wasn't a
struggle. I went from a
48 to a 28 inch waist—
the equivalent of
20 inches."

— Joey



Before



[SENSIBLE STRATEGIES TO STAY ON TRACK]

EAT WHAT YOU NORMALLY EAT

It's very important that you don't use SENSEA® as an excuse to overindulge in fattening foods or to increase the amount of food you normally eat. One pound of weight loss is equivalent to approximately 3,500 calories. While there are no food restrictions with SENSEA, remember that the goal is to eat less so that you take in fewer calories, and lose weight.

TUNE IN TO YOUR BODY'S SIGNALS

Learn to stop eating once you're full. The next time you eat, try to recognize what your hunger feels like. Think of it as a sliding scale from starving, to satisfied, to stuffed. Over time, you will learn to stop eating as soon as you become satisfied.

SET REALISTIC GOALS

Your body needs time to adapt to the physiological changes occurring, and the key to keeping weight off is to lose it at a rate that is healthy for your body.

IF YOU FORGET TO USE SENSEA

No worries! Simply sprinkle it on your next meal. In the first few weeks you may have trouble remembering to use SENSEA, but soon enough it will become second nature.

BUDDY UP TO BOOST YOUR SUCCESS

Take advantage of the resources within the SENSEA Community. Access the forums and find a weight-loss buddy who will help push you toward your goals and give you added guidance and support.

Combined
Ari and Grecia
lost 67
pounds

"Now we're both in better
shape, we're both happier,
we go out more, we do more.
It has made our life together
better. We're both using
SENSA® at the same time
and we're losing weight."
- Ari



Before



Before



[KICKSTARTING A HEALTHY LIFESTYLE]

SENSA® was designed to give you the tools you need to lead a healthier lifestyle. It is an aid to help you eat less and boost your weight loss. As you progress, you may want to shift your weight loss into high gear by eating healthier foods and incorporating exercise. This will help ensure long-term, sustainable weight loss.



lost **35**
pounds

"Once I saw the results, it motivated me to start walking and eating healthier."
— Martha



Before

Studies show average weight loss of 30 lbs in 6 months.

SATISFY CRAVINGS WITH SIMPLE SUBSTITUTIONS

Eating healthier doesn't have to be a complete overhaul of your diet. It just means making healthier choices. You can still have chocolate, but consider substitutes like chocolate-flavored cereal. It's fat-free and contains fiber and vitamins that your body needs.

CRAVING	HEALTHY SUBSTITUTE
Chips	Unsalted mixed nuts (E.g. cashews, almonds, walnuts, pecans), seeds (E.g. pumpkin, sesame, sunflower, flax), unsalted pretzels, unbuttered & unsalted popcorn
Dip	Instead of using sour cream, use plain low-fat yogurt; or try salsa instead – it's low-fat and full of veggies
Cookies	Fig bars hit the spot like cookies, but also provide fruit and fiber
Candy	Sweet fruits like strawberries, grapes, pears, cantaloupes, mangos, honey dew; dried cranberries and raisins
Ice Cream	Sherbet, smoothie, yogurt, frozen yogurt

DRINK PLENTY OF WATER

Filling up on water helps with weight loss in three ways:

- Drinking more water means less sugar-filled soda and "sports" drinks
- It helps to flush toxins from the body
- Drinking a glass right before a meal will help you feel full faster

INCORPORATE EXERCISE

Any movement is good for the body. Even the simplest activities can help to burn calories, tone muscle and raise your heart rate. Everyday activities such as doing household chores, washing your car, or taking the stairs instead of an elevator are a few ways you can help burn those extra calories.

"Once I saw the positive results, it motivated me to start walking more. I have more energy and I know that if I work out, the results will be even better."

– Dorothy



Before

Dorothy
lost **64**
pounds



Studies show average weight loss of 30 lbs in 6 months. Dorothy used Sensa for 9 months with sensible diet and exercise regimen.

[STAYING MOTIVATED]

Don't get discouraged if you're not losing weight at the same rate as others. Everyone loses weight at different rates. Weight loss doesn't happen overnight, just as gaining weight doesn't happen overnight.

We all experience bumps in the road. The important thing is to keep your head up and keep going!

"It took me a month for the weight to start to come off. Then I got encouraged and wanted to keep going. You have to be patient."

– Dina



Before

Dina
lost 37
pounds

Studies show average weight loss of 30 lbs in 6 months.

[JOIN THE SENSEA® COMMUNITY]

You have a vast network of support that you can tap into at any time, whether you need advice, encouragement, inspiration, or simply want to share the good news of your weight-loss success.

Access weight-loss tools, tips and information, or get in touch with other SENSEA users by logging in to TrySensa.com and clicking on SENSEA Community.

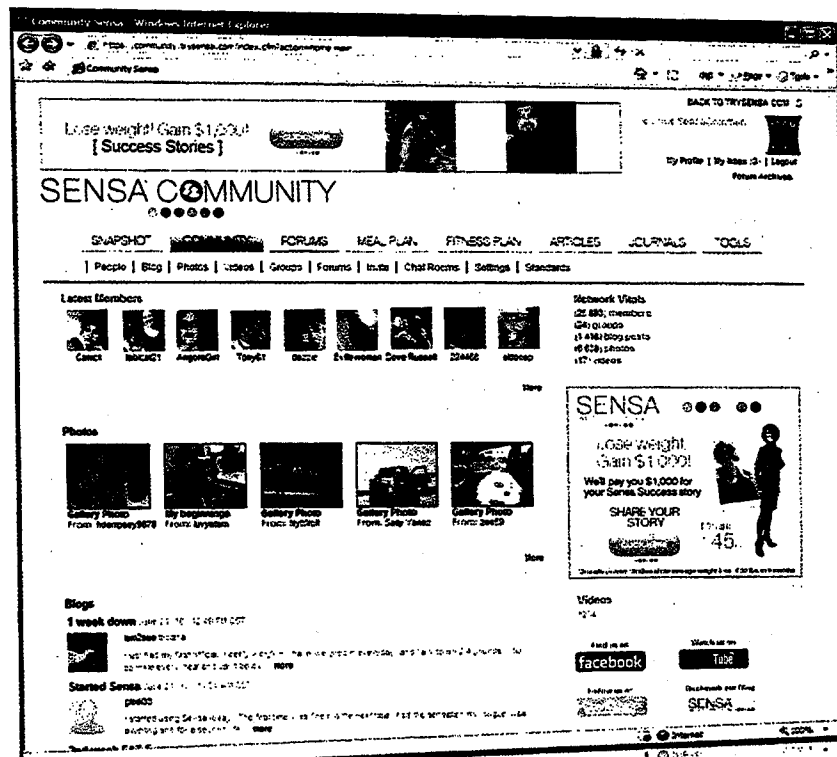
SENSEA CUSTOMER CARE:

TrySensa.com

Toll-Free U.S. & Canada: (866) 514-2554

International: (310) 683-0952

Monday-Friday, 7 a.m. – 4 p.m. PST



[FREQUENTLY ASKED QUESTIONS]

Is it possible to sprinkle too much SENSEA®?

There is no harm in using too much SENSEA; however, you will achieve the best results if you use it as directed.

Can I cook with SENSEA?

Do not cook with SENSEA. The Tastants should be sprinkled on top of meals and snacks right before eating. This way, the Tastants can properly interact with your sense of smell.

What if I am still eating my entire meal?

It is completely normal to eat your entire meal with SENSEA. However, since you are trying to lose weight, it is important that you try to pay attention to your body and stop eating when your body signals "satiety" or "fullness."

What if I still feel hungry?

Go ahead and eat. Just be sure to use SENSEA on every meal and snack.

How long will it take until I lose weight?

There is no "typical" timeline for losing weight with SENSEA. Although most people lose weight in the very first month, everyone experiences weight loss differently. Stick with the system and you will lose weight.

What long-term results can I expect?

We believe with SENSEA your body gradually adjusts over time to smaller portions, thus making it easier to practice moderation. Exercise and healthy eating are necessary to achieve long-term sustainable weight loss.

For more Frequently Asked Questions visit
TrySensea.com

SENSA[®]
WEIGHT-LOSS SYSTEM
●●●●●

TrySensa.com
(866) 514-2554

SSBOK0004B